



Ronald S. Nir
Attorney at Law

August 10, 2018

United State Magistrate Judge Steven L. Tiscione
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Strike 3 Holdings, LLC, against John Doe, et. al.

Dear Magistrate Judge Tiscione:

I am in receipt of the Court's scheduling order dated August 8, 2018 and requiring attendance of all counsel at an initial conference at 10:00 a.m. on August 23, 2018. I specifically represent the defendant Bobby Chen in this matter. I am writing to indicate that I will not be available to attend that conference as I will be on vacation which commences on Sunday, August 12th and from which counsel will return on Monday, September 3, 2018. I am requesting that a conference be held on any of the following dates: September 6th at 2:00 p.m., September 11th at 10:00 a.m. or 2:00 p.m. or September 13th at 2:00 p.m. Counsel will, of course, have the requested Discovery Plan Worksheet completed.

This is the first request for an adjournment by any counsel and while counsel has made attempts to reach out to plaintiff's attorney to no avail, thus consent was unable to be reached. The requested adjournment does not affect any other dates.

Counsel, most respectfully, requests that the Court reschedule the initial conference as requested. Counsel thanks the Court for its time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'RS' followed by a stylized flourish.

Ronald Nir